

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Nevonta EDWARDS

Case: 2:24-mj-30195
Assigned To : Unassigned
Assign. Date : 5/20/2024
CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|-----------------------|------------------------------------|
| 18 U.S.C. § 922(g)(1) | Felon in possession of a Firearm |
| 18 U.S.C. § 922(o) | Illegal possession of a machinegun |

This criminal complaint is based on these facts:
See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 20, 2024

City and state: Detroit, MI


Complainant's signature

Special Agent Timothy Madison, ATF
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Timothy Madison, Special Agent for the Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent (S/A) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and began my tenure with the ATF on March 13, 2022. I am currently assigned to the Detroit Field Division, Group II, Crime Gun Enforcement Team (CGET). As an ATF S/A, I have received specialized training at the Federal Law Enforcement Training Center including the Criminal Investigator Training Program and Special Agent Basic Training. During these programs I received a total of twenty-seven weeks of instruction (400+ hours) on subjects including federal criminal law, conducting criminal investigations, interview techniques, surveillance, undercover operations, evidence collection and firearms trafficking.
2. Prior to this, I was employed by the Michigan State Police for more than eight (8) years where I worked various specialty assignments, including directed patrol, undercover narcotics, and special investigations. During my time with the Michigan State Police, I initiated more than one hundred felony investigations as the lead detective. During my investigations, I drafted more than three hundred warrant affidavits and participated in hundreds of search warrant and arrest

operations. These investigations often included both state and federal violations and consisted of crimes of violence, firearms, and drug trafficking.

3. In addition to my specialized training and experience, I have obtained a Juris Doctor from the University of Detroit Mercy School of Law and have been a member of the State Bar of Michigan since October 2016.

4. This affidavit is in support of a criminal complaint and application for an arrest warrant for Nevonta EDWARDS for felon in possession of a firearm, Title 18 U.S.C. § 922(g)(1); and illegal possession of a machinegun, 18 U.S.C. § 922(o) committed on January 26, 2024.

5. The facts in this affidavit come from my personal observations, training, experience, and information obtained from ATF Special Agents, Task Force Officers, Police Officers, Detectives, and witnesses. This affidavit is intended to show that there is sufficient probable cause and does not set forth all information known to law enforcement regarding this investigation.

SUMMARY OF THE INVESTIGATION

6. On December 11, 2023, ATF initiated an investigation into a series of shootings that had been linked via the National Integrated Ballistics Information Network (NIBIN) to six different unrecovered firearms. One of the unrecovered firearms, a 9mm, had been used in eight known shooting incidents and was identified as one of the primary crime guns associated to the NIBIN lead (crime

gun number 774-19-000190). One of those incidents was a shots-fired incident on January 1, 2024, near EDWARD's residence.

7. On January 26, 2024, I executed a state search warrant for surveillance video evidence from EDWARDS's residence to identify who fired crime gun number 774-19-000190, on January 1, 2024, near the residence. At the same time, the Michigan Department of Corrections conducted a compliance check at the residence for EDWARDS's brother, a convicted felon on probation.

8. At the time the state search warrant and compliance check were executed, two people were present inside the residence including EDWARDS and a juvenile. EDWARDS's brother was not initially at the residence and was later summoned to the location by MDOC personnel.

9. During a search of the backyard for surveillance cameras officers saw two deceased or mortally wounded dogs. Based upon the dogs' injuries, officers believed dog fighting may have been occurring at the home.

10. EDWARDS informed me an additional dog was in the basement. Law enforcement conducted a protective sweep of the basement. During the protective sweep, officers saw a Glock pistol in plain view with an extended magazine and apparent machinegun conversion device attached, in the area near the caged dog, previously referenced by EDWARDS. The pistol was the same caliber as the fired

casings under investigation in the recent shooting and later was determined to likely be firearm used in the prior eight shooting incidents.

11. Following the observation of the firearm in plain view, a supplemental federal search warrant was obtained requesting authority to search for additional evidence of the violations. During the search, agents located a second Glock pistol in the kitchen of the home, along with indicia of residency for EDWARDS. Agents utilized the keys from within EDWARD's pocket to determine if they would unlock the front door of the home to further demonstrate EDWARD's access/control over the residence. Agents confirmed, EDWARD's keys unlocked all four locks on the front and outer door of the home.

12. MDOC personnel completed their search of the residence and confirmed EDWARDS's brother did not reside within the home. To confirm this MDOC transported EDWARDS's brother to a separate address where all his belongings were located. There was only one furnished room within the home, that appeared to contain exclusively female belongings. In the living room, kitchen, and basement of the home men's shoes were located that were consistent with the same size shoes being worn by EDWARDS 11/11.5. EDWARDS's brother's shoes were much smaller, men's size 7.

13. Investigators performed a search of City of Detroit property records to determine the owner and taxpayer information associated with the residence. The

results indicated EDWARDS was the listed owner and listed taxpayer for the residence since April of 2019.

14. Agents advised EDWARDS of his Miranda rights and interviewed him.. He admitted he had recently seen both firearms in the residence, and that he handled at least one of the firearms inside of the home. Specifically, stating he had grabbed one of the firearms by the end of the clip to move it. However, EDWARDS denied the firearms belonged to him.

15. Both firearms seized from the residence were test fired and the fired cartridge casings were entered into NIBIN for preliminary analysis. The results indicated the firearm located in the basement of the home was crime gun number 774-19-000190, which had been linked to a total of eight shooting incidents since 2019 and was the original crime gun being targeted during the investigation.

A. Interstate Nexus

16. On January 29, 2024, ATF Interstate Nexus Expert S/A Kara Klupacs physically reviewed both 9mm Glock pistols seized. SA Klupacs concluded both firearms were manufactured outside the state of Michigan, and thus would have traveled in and affected interstate or foreign commerce.

B. Prohibited Status

17. On February 2, 2024, I reviewed EDWARDS's Computerized Criminal History (CCH) from the Michigan Law Enforcement Information Network (LEIN)

and publicly available court records and learned EDWARDS had the following felony conviction.

- a. November 1, 2018, Michigan Third Circuit Court
 - Felony - Carrying Concealed Weapon

C. Illegal Possession of a Machine Gun

18. On January 29, 2024, ATF S/A Kenton Weston observed both firearms at the time they were seized and noted the Glock pistol located in the basement of the residence appeared to have a machinegun conversion device affixed to it.

19. S/A Weston is a graduate of a specialized training course on privately made firearms and machinegun conversion devices. S/A Weston has provided instruction to both state, local and federal law enforcement agencies regarding the identification and prosecution of machinegun conversion device cases.

20. According to S/A Weston a person can affix a device (i.e. Glock Switch) to a Glock-Style pistol that causes it to shoot automatically and function as a machinegun. This device replaces the back plate and typically protrudes from the back of the slide. When installed, the device applies pressure to the trigger bar and disables the firearm's ability to limit one round of ammunition to be fired per trigger pull.

21. A machinegun is a firearm under the National Firearms Act (NFA), 26 U.S.C. section 5845(a). A machinegun is defined in pertinent part, as "any part

designed and intended solely and exclusively, or combination of parts designed and intended solely and exclusively for use in converting a weapon into a machinegun.

22. Based on his review of the firearm, and his training and experience regarding machineguns and machinegun conversion devices, ATF SA Kenton Weston's opinion was that the Glock pistol located in the basement meets the legal definition of a machinegun.

23. On May 15, 2024, ATF Industry Operations Intelligence Specialist queried EDWARDS for any National Firearms Registration and Transfer Records, the results indicated EDWARDS does not have any NFA firearms registered to him.

III. CONCLUSION

23. Probable cause exists that Nevonta EDWARDS, a convicted felon, was in possession of a firearm, manufactured outside the state of Michigan, in violation of Title 18, U.S.C. § 922(g)(1) as well as in illegal possession of a machinegun, in violation of 18 U.S.C. § 922(o); and possession of a firearm not registered in the National Firearms Registration, 26 U.S.C. § 5861(d)



Timothy Madison
ATF Special Agent

Sworn to before me and signed in my
presence and/or by reliable electronic means.


HONORABLE ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: May 20, 2024